



September 17, 2014

Mr. Shawn Garvin
Regional Administrator
United States Environmental Protection Agency
Region III
1650 Arch Street (3RA00)
Philadelphia, Pennsylvania 19103-2029

RE: Risk-Based Work Plan for PCB Waste Remediation, On-Site Consolidation, and Disposal
Poor Charlie & Company, Inc.
Riverside Facility, Glasgow, Kanawha County, West Virginia
POTESTA Project No. 0101-13-0544

Dear Mr. Garvin:

Potesta & Associates, Inc. (POTESTA), on behalf of its client, Poor Charlie & Company, Inc. (Poor Charlie), is submitting with this letter a *Risk-Based Work Plan for PCB Waste Remediation, On-Site Consolidation, and Disposal* (Work Plan) for the Riverside facility in Glasgow, Kanawha County, West Virginia.

Environmental site assessments of the Poor Charlie Riverside site have identified measurable concentrations of polychlorinated biphenyls (PCBs) in the soil. The Work Plan has been prepared to assess the site, identify areas of PCB Remediation Waste, and to remediate that material through excavation, on-site relocation, and capping of impacted soil in designated areas of the site. This Work Plan also describes how elevated concentrations of lead, the other contaminant of concern at the site, will be remediated.

This is a risk-based cleanup plan in compliance with terms of Title 40, Code of Federal Regulations (CFR) Part 761.61(c) for PCB Remediation Waste at the Poor Charlie Riverside facility. The plan is designed to be protective of human health and the environment, technically feasible, appropriate, and consistent with future uses of the site. Similar cleanup projects conducted under the auspices of the United States Environmental Protection Agency (USEPA) were reviewed for guidance in preparing this plan.

In previous correspondence and discussions, the USEPA has provided comments concerning proposed remedial actions for this site. The Work Plan, in its current form, has been revised to address the comments and concerns raised.

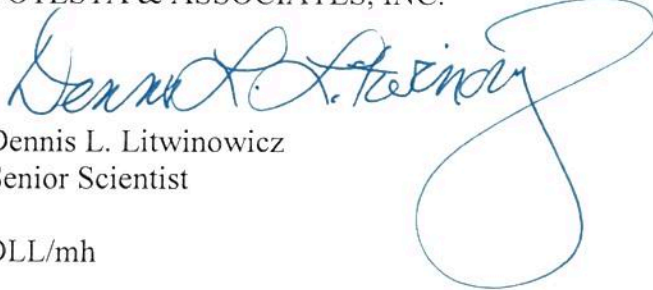
Included with the Work Plan is a signed Certification Statement as required by Title 40, CFR Part 761.61.

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POTESTA is available to discuss this submittal at your convenience. Thank you for your continued cooperation.

Sincerely,

POTESTA & ASSOCIATES, INC.

A handwritten signature in blue ink, appearing to read "Dennis L. Litwinowicz", with a large, stylized loop at the end.

Dennis L. Litwinowicz
Senior Scientist

DLL/mh

Attachment

c: Mr. Scott Rice, USEPA-Wheeling
Mr. David Hight, WVDEP
Ms. Jessica Henson, WVDEP
Mr. Jack Kessick, ProTrade Steel Company Ltd.
Mr. Roland Fisher, RJ Recycling, LLC
Ms. Ann Starcher - Lewis, Glasser, Casey & Rollins
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